

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

U.S. DISTRICT COURT
DISTRICT OF MAINE
PORTLAND
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CASE NO.: To be Assigned

NATHAN REARDON, personally and
as former managing member of Taco Shack, LLC,
Plaintiff,

v.

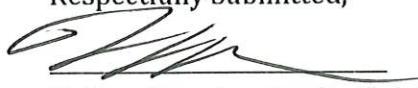
TEGNA EAST COAST BROADCASTING, LLC,
Defendant.

COMPLAINT FOR DEFAMATION (SLANDER PER SE), FALSE LIGHT, AND DAMAGES

NOW COMES the Plaintiff, Nathan Reardon, pro se, and brings this civil action for defamation, false light, and related relief against Defendant TEGNA East Coast Broadcasting, LLC, and alleges as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1332 as the parties are of diverse citizenship and the amount in controversy exceeds \$75,000.
2. Venue is proper in the Portland Division of the District of Maine pursuant to 28 U.S.C. § 1391. Plaintiff elects Portland due to demonstrated bias concerns in the Bangor division.
3. Plaintiff Nathan Reardon is a resident of the State of Maine and at all times relevant was the former managing member of Taco Shack, LLC.
4. Defendant TEGNA East Coast Broadcasting, LLC is a Delaware limited liability company with its sole member being TEGNA, Inc.
5. On or about April 15, 2021, Defendant broadcast a defamatory headline on Channel 2 News: "Man from Skowhegan abuses PPP program for personal gain."
6. This statement is false. The government's federal charge involved \$59,145—not the falsely stated \$100,000+.
7. Defendant did not verify this information, nor did it offer Plaintiff the opportunity to respond.
8. Defendant further included interviews with individuals (Daniel Watson, Dina Whited, and Kaitlyn Clay) who provided false statements, which Defendant failed to fact-check.

Respectfully Submitted,



Nathan Reardon, Pro Se Plaintiff
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